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June 4, 2021

Hon. Paul A. Crotty
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

6/7/2021

*The matter will be adjourned to
July 29, 2021 @ 10 AM*

As ordered

Re: United States v. Michael Paulsen
Cr. Docket No. 19-660 (PAC)

Paul Muthy
CSNY

Dear Judge Crotty:

Along with Joseph V. Sorrentino, I represent Mr. Paulsen in the above-referenced matter. I write to request an adjournment of the sentencing, presently scheduled for June 14, 2021, of approximately six weeks.

Having reviewed the presentence report and the character letters provided by Mr. Paulsen's family, friends and colleagues, it now appears to counsel that Mr. Paulsen may suffer from significant mental and emotional trauma that may have contributed to his involvement in the instant offense or may otherwise effect the Court's determination of what an appropriate sentence may be. The defense has engaged a psychiatrist to evaluate Mr. Paulsen and to prepare a psychiatric report for the Court's consideration in the coming weeks. An adjournment of six weeks should allow counsel sufficient time to review the report and draft and submit a timely sentencing memorandum. The government, as per AUSA Elinor Tarlow, does not object.

Respectfully submitted,


James M. Branden